

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**TERESSA JANETTE GALLEGOS, Individually and as
Personal Representative of the ESTATE OF
JOSEPH ORAN VAN WINKLE, Deceased;
and MARY ANN VAN WINKLE,**

Plaintiffs,

v.

Cause No. 13-CV-01055-JB/KBM

**MAUREEN WOOD, M.D.; and
MEDICAL DOCTOR ASSOCIATES, LLC,**

Defendants.

CONSOLIDATED WITH

**TERESSA JANETTE GALLEGOS, Individually and as
Personal Representative of the ESTATE OF JOSEPH
ORAN VAN WINKLE, Deceased; and MARY ANN VAN WINKLE,**

Plaintiffs,

v.

Cause No. 15-CV-00187 SCY/KK

UNITED STATES OF AMERICA,

Defendant.

JOINT MOTION TO DISMISS WITH PREJUDICE

COME NOW the Plaintiffs, Teresa Janette Gallegos, Individually and as Personal Representative of the Estate of Joseph Oran Van Winkle, Deceased; and Mary Ann Van Winkle, (“Plaintiffs”), by and through their counsel of record, and Defendants, Maureen Wood, M.D. (“Dr. Wood”) and Medical Doctor Associates, LLC, (“MDA”), by and through their counsel of record, and, hereby move the Court for entry of an Order of Dismissal with Prejudice as to Dr. Wood and MDA.

WHEREFORE, the parties jointly pray for the entry of an Order dismissing the above-

captioned and numbered cause with prejudice as against Defendants, Maureen Wood, M.D. and Medical Doctor Associates, LLC, with each party to bear their own costs and attorney fees incurred in connection with this case.

Jointly Submitted by:

THE PERRIN LAW FIRM

By: Telephonically Approved – 5/3/17

Doug Perrin

Attorney for Plaintiffs

1322 Paseo de Peralta

Santa Fe, NM 87501

(505) 989-8800

(214) 646-6117 (facsimile)

dougperin@perrinlaw.org

REMO E. GAY & ASSOCIATES, P.C.

By: /s/ Remo E. Gay

Remo E. Gay

Brendan O'Reilly

Attorneys for Defendants Maureen Wood, M.D.

And Medical Doctor Associates, LLC

3810 Osuna Rd NE, Suite 1

Albuquerque, New Mexico 87109

(505) 842-5715

(505) 842-5713 (facsimile)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused service, via CM-ECF of true and correct copy of the Joint Motion to Dismiss with Prejudice on this 3rd day of May of 2017, and upon the following counsel of record:

Doug Perrin, Esq.
THE PERRIN LAW FIRM
1322 Paseo de Peralta
Lower Level
Santa Fe, NM 87501
(505) 989-8800
(214) 646-6117

dougperin@perrinlaw.org

Ruth Fuess Keegan
Assistant United States Attorney
P.O. Box 607
Albuquerque, NM 87103
(505) 224-1503
(505) 346-7205 facsimile
Ruth.F.Keegan@usdoj.gov

By: /s/ Remo E. Gay
Remo E. Gay